

EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert J. Ounjian, SBN 210213 Robert Vetchtein, SBN 232179 CARPENTER & ZUCKERMAN LAW OFFICES OF VETCHTEIN & ASSOCIATES, APC 8827 West Olympic Blvd. 13 Corporate Plaza Dr., Ste 115 Beverly Hills, CA 90211 Newport Beach, CA 92660 TELEPHONE NO: (310) 273-1230 FAX NO. (Optional): (310) 858-1063 E-MAIL ADDRESS (Optional): robert@czrlaw.com ATTORNEY FOR (Name): THOMAZ SERRA and MARIA TAMIRIS CAVALCANTE DA SILVA		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: 700 Civic Center Drive West CITY AND ZIP CODE: Santa Ana, 92701 BRANCH NAME: Central Justice Center		
PLAINTIFF: THOMAZ HENRIQUE SERRA, an individual; MARIA TAMIRIS CAVALCANTE DA SILVA, an individual DEFENDANT: ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and <input checked="" type="checkbox"/> DOES 1 TO 20		
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input checked="" type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): Loss of Consortium <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):		
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER: 30-2021-01234123-CU-PA-CJC Assigned for All Purposes Judge Theodore Howard

1. **Plaintiff (name or names):** THOMAZ HENRIQUE SERRA, an individual; MARIA TAMIRIS CAVALCANTE DA SILVA, an individual alleges causes of action against **defendant (name or names):** ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and DOES 1 TO 20
2. This pleading, including attachments and exhibits, consists of the following number of pages: 6
3. Each plaintiff named above is a competent adult
 - a. ☐ **except plaintiff (name):**
 - (1) ☐ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ a public entity (describe):
 - (4) ☐ a minor ☐ an adult
 - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) ☐ other (specify):
 - (5) ☐ other (specify):
 - b. ☐ **except plaintiff (name):**
 - (1) ☐ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ a public entity (describe):
 - (4) ☐ a minor ☐ an adult
 - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) ☐ other (specify):
 - (5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: SERRA, et al. v. HUCKINS, et al.	CASE NUMBER:
---	--------------

4. ☐ Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ **except** defendant (name): ALLY LLC
 (1) ☒ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- c. ☐ **except** defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- b. ☐ **except** defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- d. ☐ **except** defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (specify Doe numbers): 1 to 20 _____ were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (specify Doe numbers): 1 to 20 _____ are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a. ☐ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (specify):
9. ☐ Plaintiff is required to comply with a claims statute, and
- a. ☐ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (specify):

PLD-PI-001

SHORT TITLE: SERRA, et al. v. HUCKINS, et al.

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☒ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (*specify*): Loss of Consortium

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☒ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☒ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (*specify*): past and future medical expenses; past and future wage loss and loss of earning capacity; past and future household services; past and future incidental expenses; and past and future pain and suffering. Past and future loss of consortium including, without limitation, the loss of love, companionship, comfort, care, assistance, protection, affection, society, and moral support; and the loss of enjoyment of sexual relations.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*): General Negligence; Motor Vehicle; and Loss of Consortium

16. DEMAND FOR JURY TRIAL. Plaintiff hereby demands a trial by jury in all the aforementioned matters.

Date: December 1, 2021

Robert J. Ounjian

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: SERRA, et al. v. HUCKINS, et al.

CASE NUMBER:

First
(number)**CAUSE OF ACTION—General Negligence**

Page 4

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint*(Use a separate cause of action form for each cause of action.)*

GN-1. Plaintiff (name): THOMAZ HENRIQUE SERRA, an individual; MARIA TAMIRIS CAVALCANTE DA SILVA, an individual
 alleges that defendant (name): ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): or about September 24, 2021

at (place): or near State Route 55, 50 feet south of Interstate 405

(description of reasons for liability):

On or about September 24, 2021, Defendants Adam Daniel Huckins, Ally LLC, and Does 1 to 20 were negligently operating a motor vehicle and traveling on State Route 55 when they caused Plaintiff Serra to collide with another vehicle and a wall and be ejected from his vehicle, causing severe injuries to Plaintiff Serra.

The defendants' negligence caused severe injuries to Plaintiff Serra. Defendants drove with excessive speed, failed to keep a proper lookout, failed to stay in their lane, and performed an unsafe lane change, without limitation.

Plaintiff Maria Tamiris Cavalcante Da Silva was at all times the legally married wife of Plaintiff Thomaz Serra.

Defendants Adam Daniel Huckins, Ally LLC, and Does 1 to 20 negligently managed, maintained, repaired, drove, and/or operated their vehicle as to proximately cause the collision and permanent injuries to Plaintiffs.

Defendants Adam Daniel Huckins, Ally LLC, and Does 1 to 20 negligently owned, entrusted, and permitted the vehicle to Defendants which caused the collision and injuries to Plaintiffs.

Plaintiff Thomaz Serra's damages include: past and future pain and suffering/emotional distress; past and future loss of earnings; past and future loss of earning capacity; past and future medical expenses; past and future healthcare expenses; past and future incidental expenses; and past and future household services.

Plaintiff Maria Tamiris Cavalcante Da Silva's damages include: loss of consortium; loss of love, companionship, comfort, care, assistance, protection, affection, society, moral support, training and guidance, and the loss of enjoyment of sexual relations.

Plaintiffs have suffered damages in a sum according to proof.

SHORT TITLE: SERRA, et al. v. HUCKINS, et al.	CASE NUMBER:
---	--------------

Second
(number)

CAUSE OF ACTION—Motor Vehicle

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): THOMAZ HENRIQUE SERRA, an individual; MARIA TAMIRIS CAVALCANTE DA SILVA, an individual

MV- 1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries

and damages to plaintiff; the acts occurred

on (date): or about September 24, 2021

at (place): or near State Route 55, 50 feet south of Interstate 405

MV- 2. DEFENDANTS

- a. ☒ The defendants who operated a motor vehicle are (names): ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and

☒ Does 1 to 20

- b. ☒ The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and

☒ Does 1 to 20

- c. ☒ The defendants who owned the motor vehicle which was operated with their permission are (names): ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and

☒ Does 1 to 20

- d. ☒ The defendants who entrusted the motor vehicle are (names): ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and

☒ Does 1 to 20

- e. ☒ The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): ADAM DANIEL HUCKINS, an individual; ALLY LLC, a business entity of unknown form; and

☒ Does 1 to 20

- f. ☒ The defendants who are liable to plaintiffs for other reasons and the reasons for the liability are ☐ listed in Attachment MV-2f ☒ as follows: as detailed in the first cause for General Negligence incorporated herein, and

☒ Does 1 to 20

Page 5

SHORT TITLE: SERRA, et al. v. HUCKINS, et al.

CASE NUMBER:

ATTACHMENT (Number): One*(This Attachment may be used with any Judicial Council form.)*

Third CAUSE OF ACTION - Loss of Consortium

By Plaintiff MARIA TAMIRIS CAVALCANTE DA SILVA against all Defendants.

Plaintiff TOMAZ SERRA was at all relevant times the lawfully married husband of MARIA TAMIRIS CAVALCANTE DA SILVA.

Plaintiff incorporates Causes of Action #1 and #2 herein.

As a direct, proximate, and legal cause of Defendants' actions, Plaintiff MARIA TAMIRIS CAVALCANTE DA SILVA has been, and will continue to be, deprived of the consortium, love, companionship, comfort, care, assistance, protection, affection, society, moral support, training and guidance, and loss of enjoyment of sexual relations with her husband, thereby causing and continuing to cause Plaintiff past and future economic and non-economic damages in a sum according to proof at trial.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 6 of 6*(Add pages as required)*